



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE

001-008-050-1-1



STEVEN E. CHESTER
DIRECTOR

June 25, 2008

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Mr. J. Scott Wing
T.E.S. Filer City Station
P.O. Box 12
Filer City, Michigan 49634

SRN: N1685, Manistee County

Dear Mr. Wing:

This is in response to your submittal of a revised Fugitive Dust Control plan for T.E.S. Filer City Station. The revision was necessary due to concerns over language in the existing plan and changes in fugitive dust control methods including the installation of a high pressure coal pile watering system. The Fugitive Dust Control plan is required by Table B of your Renewable Operating Permit (ROP) No. 199600181. The AQD has completed our review of the plan which we received via Email on June 18, 2008. As a result of our review we have determined that the plan, dated June 17, 2008 (attached), meets the requirements for a Fugitive Dust Control plan and is approved as required by your ROP.

If you have any questions regarding approval of the Fugitive Dust Control plan, please contact Mr. Kurt Childs at 231-775-3960 extension 6253.

Sincerely,

Janis Denman
Cadillac District Supervisor
Air Quality Division
231-775-3960 Extension 6250

Enclosure

T.E.S. FILER CITY STATION FUGITIVE DUST CONTROL PROGRAM

RENEWABLE OPERATING PERMIT
NUMBER: 199600181

UNPAVED ROADS AND UNPAVED AREAS

T.E.S. Filer City Station shall apply an AQD approved dust suppressant (including water) at a suitable concentration and quantity to perform effective dust control to all unpaved roadways and unpaved areas where dust is created during normal plant activities. The suppressant shall be applied when dust is observed in such areas. Unpaved areas that are landscaped, covered with stone, planted with grass or other vegetation, or otherwise do not generate dust during normal plant activities, are excluded.

T.E.S. shall record the date and time that each application is made.

PAVED ROADS AND PARKING AREAS

T.E.S. Filer City Station shall clean paved roads and parking areas that accumulate dust-generating material, utilizing a wet sweeper at a frequency adequate to control fugitive dust.

T.E.S. shall record the date and time that each sweeping activity is made.

COAL PILE VESSEL UNLOADING AND PLANT FUELING OPERATIONS

Vessel Unloading.

- When unloading occurs during daylight periods, vessel unloading shall be monitored by the coal handlers or the plant control room via camera. If dusting is observed, vessels shall be instructed to add water to the coal to the extent that dusting is eliminated.
- When unloading occurs during non-daylight periods, vessels shall add water to the coal to preclude dusting.
- Minimum drop heights shall be maintained within the capabilities of the vessel unloading boom.

Plant Fueling Operations.

- Coal handlers shall monitor the coal pile and adjacent areas for fugitive dust during plant fueling operations and shall apply dust suppressant or water to effectively control dust as required.
- During periods when plant fueling operations are not underway, plant control room operators shall monitor the coal pile and adjacent areas, and shall apply water to effectively control dust that may be observed.

NOTE: T.E.S. utilizes a high pressure coal pile watering system where individual water cannons can be activated by remote control from both the Coal Handling Loaders and the plant control room to control dust on the coal pile and adjacent areas. The pile can be monitored by camera from the control room. Thus, water can be placed precisely where dusting activity is observed by either the coal handlers during plant fueling operations, or the plant control room after plant fueling is completed.

TRAFFIC SPEEDS

Vehicular traffic on all plant roadways shall be limited to a maximum speed of 10 miles per hour and shall be posted near the plant entrance.

6/17/08 Rev.0